

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted Date: November 16, 2016

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SUBJECT: Partial Compliance Evaluation of Sprague Terminal in Providence, RI

FROM: Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit *EAK 11/21/16*

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 11/21/16*

TO: File

I. Facility Information

- A. Facility Name: Sprague
- B. Facility Location: 144 Allens Avenue, Providence, RI
- C. Facility Mailing Address: same
- D. Facility Contact: Eric Smith
- E. AFS #: 4400700542

II Background Information

- A. Date of inspection:
- B. Weather Conditions: overcast and foggy, approximately 55°F
- C. US EPA Representative(s):
Beth Kudarauskas, OES Air Tech Unit
Bill Osbahr, OEME
- D. State Representative(s):

III Purpose of Inspection

The purpose of this inspection was to investigate a specific complaint about this Sprague facility. The complaint was originally received by RI DEM and was referred to EPA.

IV Facility Description

A. Company / Facility History:

Sprague is a wholly owned subsidiary of Axel Johnson Inc., a member of the Axel Johnson Group of Stockholm, Sweden. The company was incorporated on 10/9/1987 in the state of Delaware. Sprague owns and operates a bulk fuel distribution terminal with loading rack in Providence, RI.

V Inspection

A. Entry:

The inspectors arrived at the facility at approximately 9:00 am. The inspectors showed their credentials to terminal security and were informed that no management was currently at the facility and so the inspectors were not allowed to enter until later in the afternoon. The inspectors stepped outside the security office.

Several minutes after the inspectors left the office, the security representative stated that the terminal manager had been contacted and would be on-site in an hour. The inspectors agreed to meet the terminal manager at 10:00am.

B. Off-Site Monitoring

The inspectors left the facility and found an off-site location to observe facility operations. Specifically, the inspectors were able to observe Sprague's Tank 5 from a location across Allens Avenue near Interstate 195.

From this location the inspectors were able to observe two of the vents on the top of Tank 5. Both inspectors detected strong odors of asphalt at this location.

Ms. Kudarauskas observed visible emissions from one of the vents on the top of Tank 5. The smoke was blue-ish in color. Although a full Method 9 was not completed, Ms. Kudarauskas made several instantaneous opacity readings of 35% or more. Several photos and videos were taken from this off-site location to document the opacity (Attachment A).

Mr. Osbahr was able to use the FLIR camera and a telephoto lens at the off-site location to observe VOC emissions from the Tank 5 vents. FLIR videos were recorded (Attachment A).

C. Opening Conference:

The inspectors arrived at the Sprague facility at 10:40am and showed their credentials to Mr. Eric Smith, the Terminal Manager.

Ms. Kudarauskas informed Mr. Smith that the site visit was the result of a complaint. Specifically, the complaint described odors and smoke coming from Tank 5 at the Sprague facility. The inspectors stated that the site visit would focus on Tank 5.

Mr. Smith granted permission for the inspectors to take photos and video using a traditional camera as well as a FLIR camera. However, Mr. Smith requested copies of all photos and videos taken on-site as well as the Make and Model of the cameras used. Ms. Kudarauskas stated that she could follow-up with copies of all photos and videos after the inspection but would not be able to provide copies the day of the inspection. Mr. Smith agreed to this arrangement.

Mr. Smith stated that there is no odor control system at the Providence facility. Tank 5 is an insulated tank that contains a product named roofing flux asphalt. At the time of the inspection, the product was heated to a temperature of 300°F. The maximum capacity of Tank 5 is 125,869 barrels and at the time of the inspection the tank level was at 39 feet, 4.5 inches. The most recent product delivery into Tank 5 was on September 18, 2016.

D. Plant Walkthrough

The weather changed during the inspection and fog rolled into the area by the time the inspectors were led to the tank farm.

Mr. Smith and the inspectors climbed Tank 5, which contains roofing grade asphalt. Ms. Kudarauskas noted three vents in addition to a sampling hatch at the top of Tank 5. Due to the weather conditions a visible emissions reading could not be made from the top of the tank. Ms. Kudarauskas did take photographs of each of the three roof vents. Mr. Osbahr used the FLIR camera and was able to detect VOC emissions. Four FLIR videos were recorded at the top of Tank 5.

The inspectors reviewed all photos and FLIR videos collected on-site with Mr. Smith.

E. Closing Conference

In closing, Ms. Kudarauskas stated that she observed visible emissions before entering the facility and noted asphalt odors in the area. The inspectors thanked the facility representatives for their time and cooperation.

F. Follow-up

Mr. Smith contacted Ms. Kudarauskas by email on November 8, 2016 to re-state his request for copies of the photos and videos collected by the inspectors while on-site. In addition, Mr. Smith requested a copy of the original complaint.

Ms. Kudarauskas forwarded a copy of the original complaint by email to Mr. Smith on November 9, 2016. Also on November 9, 2016 Ms. Kudarauskas mailed a CD containing the photos and videos collected during the site visit to Mr. Smith. Ms. Kudarauskas received confirmation that the CD was received when the green Certified Mail card was returned.

